



GOVERNMENT OF SINDH
HOME DEPARTMENT

**SUB: IMPLEMENTATION COMMITTEE OBSERVATIONS AND WAY FORWARD
FOR IMPLEMENTATION OF THE REPORT OF COMMISSION OF INQUIRY ON
GUL PLAZZA SHOPPING CENTER FIRE INCIDENT**

The Implementation Committee, constituted for suggesting way forward for implementation of the report of Commission of Inquiry on Gul Plaza Shopping Center Fire Incident, held five (05) meetings and discussed conclusion of the Commission of Inquiry against each of its ToRs. The Implementation Committee afforded ample opportunity to departments, officers, officials and private persons (list attached).

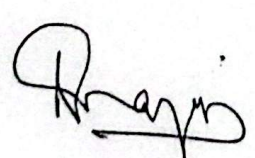
2. After detailed deliberations, the Implementation Committee has finalized its detailed report which is placed at **Annex-A**. For ease of the worthy members of the Cabinet, a summary of the way forward and fixation of responsibility is also finalized and placed at **Annex-B**.



1. Additional Chief Secretary
Home Department



2. Minister for Industries



3. Minister for Local Government,
Housing and Town Planning
Department



4. Minister for Home, Law, Parliamentary
Affairs and Prosecution Services
Department

Officers/officials/Private Persons Afforded Opportunity of giving their view point

1. Senior Member, BoR
2. ACS Local Govt.
3. Secretary Energy Dept
4. DG SBCA
5. Member (LU), BoR
6. MC KMC
7. DG Rescue 1122
8. Chief Fire Officer, KMC
9. DC South
10. Director, CD
11. Addl. Controller South, CD
12. Senior Instructor South, CD
13. Electric Inspector, Energy Dept.
14. Mr. Tanveer Pasta, President, MC Gul Plaza
15. Mr. Imran Elahi. Ex-GS, MC Gul Plaza

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GUL PLAZA		
TERMS OF REFERENCE (TORs)	COMMISSION FINDINGS	COMMITTEE OBSERVATIONS
A. To examine if the building approvals and lease extensions by Sindh Building Control Authority, its predecessor organizations and KMC were in accordance with applicable laws, rules and regulations;	<p>KMC's title is not established beyond the limited right traced to Resolution No. 6072 of 1873, and the 1991 renewal remains materially open to legal objection.</p> <p>On the building-approval side, the approvals culminating in the 1998 revised plan and the 2003 regularization remain part of the operative record, but the legality of that regularization is itself materially open to objection for the reasons stated above, including want of lessor-side approval.</p>	<p>The Implementation Committee examined the issue by providing ample of opportunity to BoR and KMC to substantiate their claim/right over the said land.</p> <p>KMC</p> <p>KMC by virtue of two resolutions (govt. resolution no. 6072 of 1873 (commencing dated 9th July, 1884) and 344 of 1989, (however it was recorded in 1991 minutes dated 12-10-1991), as well as the relevant legislative enactment, namely the Bombay Act No. XVII of 1933, asserts its claim arising therefrom; accordingly, prima facie, the authority competent to grant was KMC and the subsequent allotment to M/s Jenica (Pvt.) Ltd stands substantiated.</p> <p>Brief Facts</p> <p>That the land upon which Gul Plaza was constructed was handed over to the Municipality by the Government, as stated by Director Land, KMC. It was indicated that the listed properties were transferred to the Municipality in 1873 pursuant to Government Resolution No. 6072 of 1873.</p> <p>KMC has also relied on Section-50 of the City of Karachi Municipality Act, 1933 (the Act, 1933) which states that:</p> <p>Section-50: Transfer to Corporation of property of municipality of Karachi:</p>

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		<p><i>All such immovable and other property and all rights and interests within or without the limits of the City as are held by or in trust for, or have been granted by the Crown to, the Municipality of Karachi, shall, upon and after the day on which this Act comes into force, vest in the Corporation as trustees for the purposes of this Act, but subject to all trusts, charges and liabilities affecting the same.</i></p> <p>The document provided by KMC, read in conjunction with Section-50, makes it abundantly clear that the property in question vests in the Corporation, i.e., KMC, which has remained in possession thereof since the British colonial era.</p> <p>The subject property was initially leased by the Karachi Municipality in 1936 for a term of 99 years, with effect from 09.07.1884, in favour of the East India Tramway Co. Ltd. The leasehold rights were subsequently transferred to M/s Mullah Muhammad Ali Ismailji & Sons through a registered Conveyance Deed in 1950. Thereafter, the last transfer was affected in favour of M/s Jenica (Pvt.) Ltd. Vide Conveyance Deed dated 03.07.1983.</p> <p>The lease of the subject land, having been granted for a period of 99 years, expired on 08.07.1983. Prior to its expiry, the last transferee, M/s Jenica (Pvt.) Ltd., applied for renewal of the lease on 05.07.1983 in accordance with the terms and conditions thereof. The said lease was subsequently renewed by the lessor, i.e., KMC on 28.09.1991, by the then Mayor of Karachi (Mr. Farooq Sattar), upon payment of Rs. 600 per square yards.</p>
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<p>B. To assess if the construction of Gul Plaza was in violation of the approved building plan leading to difficulty in evacuation of people;</p>	<p>The issue of legality of the 2003 regularization stands noted and remains materially open, particularly in light of the absence of lessor-side approval on the present record. But until that question is determined by a competent authority, the Commission proceeds on the basis that the revised 1998 plan regularized in 2003 remains the operative approved plan.</p> <p>Since that regularization, no later building-control audit, site comparison, or other material has been</p>	<p>That as per the record of right registers of KMC, the subject property is recorded in the name of M/s Jenica (Pvt.) Ltd.</p> <p>In view of the foregoing, it is evidence that, pursuant to Government Resolution NO. 6072 of 1873, Section-50 of the Act, 1933 (Bombay Act No. XVII of 1933) and the KMC Register of Rights, the subject property vested in the Corporation and was duly leased in favour of a private party. The leasehold rights were subsequently transferred to various private entities, with M/s Jenica (Pvt.) Ltd. being the present and last transferee. It appears that the Commission was not properly apprised of the actual facts and the law</p> <p>BoR</p> <p>The facts furnished by the KMC and BoR are identical. However, BoR stated that being the land granting authority of a state land, it has superior propriety right over the said land, but never contested it.</p> <p>SBCA (with reference to ToRs A & B)</p> <p>In 1979, initial approval by KDA for constructions of flats and shops.</p> <p>Ultimately, after litigation revised plan was issued in 1998 by SBCA and in 2003 the violations were regularized conditionally wherein the total number of shops was to be 1,102 whereas, at the time of incident the total number of shops in terms of claims that have arisen the number of shops had increased to over 1,153. How</p>
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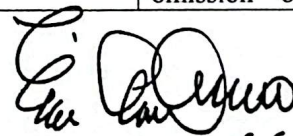
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	<p>identified on the present record showing fresh violations against the approved or regularized position. SBCA itself records that the last audit was undertaken on 22.02.2003. It is only in that context, the record does not presently establish post-regularization construction violations.</p>	<p>the number of shops has increased without the approval of SBCA and other competent authorities, which could have ultimately played a role in the prohibiting evacuation of the people.</p> <p>Further, as per SBCA, their mandate only extends up to construction phase of the building and it has no role subsequent to construction. This raises serious question about the role of the field officers. In view of the apparent absence of an effective post-construction monitoring mechanism, it is recommended that suitable amendments be introduced in the Sindh-Building Control Ord (SBCO), 1979 to expressly empower field officers to carry out inspections of buildings after completion of construction.</p> <p>Also, it is recommended that a comprehensive and periodic inspection regime may be established, mandating the SBCA, Civil Defence, Rescue 1122, KMC and Cantonment Boards etc. to conduct inspections of all buildings particularly high rise, commercial structures, to ensure continued compliance with approved plans, fire safety standards and other applicable regulations.</p>
<p>C. To assess arrangements in place at Gul Plaza building for fire prevention, detection and fire-fighting by building management as required under applicable laws and safety regulations;</p>	<p>The management of Gul Plaza failed to maintain a functional fire fighting system, maintain alarm or communication mechanisms, and provide safe evacuation conditions. The building was being operated without the minimum capacity to control or respond to the fire at its initial stage, thereby exposing occupants to foreseeable and avoidable risk.</p>	<p>The Implementation Committee afforded adequate opportunity to Mr. Tanveer Pasta, who introduced himself as the President of the Management Committee of the Gul Plaza. Upon inquiry as to whether the said Management Committee was duly registered under the relevant laws, Mr. Pasta responded in the negative. Consequently, the functioning of the purported Management Committee is prima facie without lawful authority, being unregistered and, therefore, ultra vires the applicable legal framework.</p>

In such circumstances, the statements made on behalf of the said Management Committee before the Commission of Inquiry are liable to be viewed with caution and may be construed as lacking credibility. This inference is further reinforced by the fact that, when questioned by the Commission of Inquiry regarding ownership of any shops within the Gul Plaza, Mr. Pasta asserted ownership of **two shops** but failed to produce any documentary evidence of title in support of his claim.

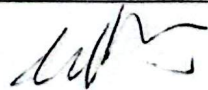
Notwithstanding the absence of registration, such deficiency does not, in the considered view of the Commission of Inquiry, dilute the **culpability** of the Management Committee. As the Commission of Inquiry stated that the Management Committee exercised **de facto control** over the **maintenance, safety arrangements, and operational decision-making** concerning the premises. In particular, Mr. Pasta appears to have exercised substantial authority over the affairs of the building and, accordingly, bears **liability** for its condition.

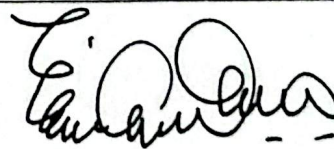
The **Forensic Report** from the **Punjab Forensic Science Agency** dated 2nd February, 2026 unequivocally identifies widespread **encroachments** across all floors of the Gul Plaza. The narrowing of alleys and passages, as noted therein, contributed to the entrapment of radiant heat, thereby accelerating temperature escalation and facilitating the rapid spread of fire from the ground floor to the upper levels. The existence of encroachment is further substantiated by the fact that, at the time of incident, the Gul Plaza housed **1,153 shops (51 in excess of the revised approved plan)**, whilst **only 2 to 4 exits were accessible, as noted by the Commission**. This omission on part of the unlawful Management



		<p>Committee, which cannot be overlooked, impeded safe egress and resulted in fatalities, thereby constituting gross negligence and attracting criminal liability.</p> <p>Further, the Commission of Inquiry has further taken note of a Certificate dated 20th March 2024, purportedly issued by the Fire Department, KMC stating that the existing fire-fighting equipment was in workable/ serviceable condition. However, this Certification stands in apparent contradiction to the response furnished by the Chief Fire Officer, KMC to the questionnaire, wherein reference was made to a Fire Audit conducted in 2021, as recorded in the preliminary fire incident report dated 16th February, 2026. The said audit report had identified multiple violations, which, it appears, remained unaddressed.</p> <p>The most disturbing aspect is that Mr. Pasta, in his oral statement before the Commission, admitted that minor fire incidents had previously occurred within the Gul Plaza premises and were apparently controlled internally. Despite being aware of these deficiencies, no corrective measures were taken by the management.</p> <p>The Commission's report further records that, even after the fire incident was known to the management at approximately 10:10 p.m., efforts were initially made to control the situation internally, much like the earlier minor incidents, by using extinguishers and fire balls. However, the Fire Department was not contacted until 10:26 p.m.</p> <p>The Commission strongly emphasized that this delay in seeking professional firefighting assistance occurred at a stage when "<i>containment and guided evacuation still had a realistic prospect of success.</i>" In other words, many of the lives lost in the fire could potentially have</p>
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been saved had timely intervention been sought, let alone the omission on part of the management committee which, despite Mr. Pasta informing the Commission of Inquiry about the existence of a public announcement system in the premises, **failed** to utilize the same to alert the occupants/ visitors regarding the location, scale and direction of the fire, or to provide guidance concerning the limited exits available for evacuation from the premises. This alone puts the stance adopted by Mr. Pasta in jeopardy when in response to the questionnaire, stated that the *"Gul Plaza staff ... were duly trained for emergency response."*

Further, the Chief Fire Officer, KMC in his statement before the Implementation Committee, asserted that the aforementioned Certificate was issued without proper authorization. At the same time, the Commission of Inquiry observed that the KMC did not repudiate the issuance of such certificate **at any stage**. In light of these inconsistencies, the Implementation Committee has proposed a detailed course of action under **ToR D**.

Confined, however, to the scope of **ToR C**, the Implementation Committee is of the considered view that the encroachments within the Gul Plaza stand conclusively established on the basis of the Forensic Report. Moreover, the issuance of the impugned certificate, being prima facie raises a reasonable inference of collusion between certain officers/officials of the Fire Department and Mr. Pasta. The fact that violations identified in the 2021 Fire Audit were reiterated in the preliminary fire incident report 2026, yet appear not to have been rectified, lends further weight to inference that the 2024 certificate may have been issued to override the earlier adverse findings, thereby raising

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D. To assess if the building management or any government department/agency had carried out fire safety audits and whether the recommendations were implemented by the building management;

There was no fire safety audit either by the management or any other government agency other than the Civil Defence and the Fire Department, KMC.

The record does not demonstrate any further enforcement action on the part of the Fire Department either. However, the fire department has apparently issued certificate dated 20.03.2024 which was submitted along with the response to questionnaire of Mr. Pasta to Gul Plaza in respect of fire equipment being in order. Such certificate was not denied by the Fire Department at any stage. However, the said certificate merely records that the present fire equipment was "in working/serviceable" condition. This does not give too much clarity as to what arrangements were in place and what metrics were utilized by

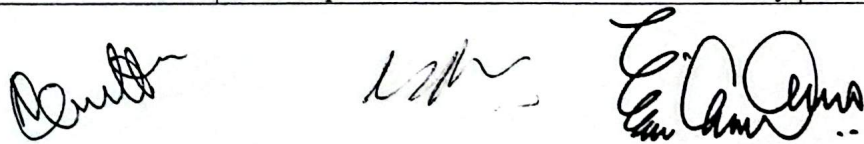
questions regarding potential liability on the part of Mr. Pasta.

Similarly, the Implementation Committee is further restrained to recommend that a thorough inquiry may be conducted into the affairs of the unregistered management committee which had been collecting funds for the maintenance of the premises, particularly to ascertain how and where such funds were being utilised, despite the continued existence of serious safety deficiencies within the building. What may previously have been regarded as fortunate escapes from smaller fire incidents now appear to have been mere stroke of luck until the present tragedy exposed the grave consequences of such continued neglect, to say the least.

Civil Defence

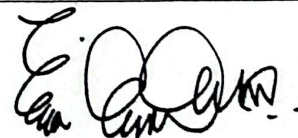
The Committee afforded adequate opportunity of hearing to Ms. Fatima Memon, Additional Controller (South), Civil Defence and Mirza Mursaleen Baig, Senior Instructor.

As per their respective statements, physical inspections of the subject premises were conducted to assess the availability and adequacy of fire-fighting equipment and other allied safety measures. Both officers deposed that inspections were carried out by the Senior Instructor (who conducted the inspections in question) on 27th June, 2024 and 16th July, 2025, respectively. It was further stated that these inspections were undertaken pursuant to letters issued by the Additional Controller, Civil Defence, dated 24th May, 2024 and 12th July, 2025. However, it



	<p>the Fire Department to grant this certificate. What is more concerning is the fact that the Fire Department itself attributed the cause of the fire to a complete lack of fire-alarm systems, sprinkler system and other safety measures. How this certificate was granted in light of these assertions raises serious questions.</p> <p>At the same time, the enforcement response of the Civil Defence Department did not follow through to its logical conclusion, as further proceedings were not initiated in a timely manner.</p> <p>The position advanced by SBCA, that inspections are ordinarily complaint-driven, does not satisfactorily explain the absence of scrutiny of a large-scale commercial structures such as Gul Plaza, particularly where applicable building regulations impose continuing obligations relating to fire safety and compliance in terms of Section 7-F of the Sindh Building Control read with the KBTR 2002. SBCA in its response dated 01.04.2026 whilst acknowledging primary responsibility in so far as enforcement of KBTR 2002 is concerned, but at the same time states that its role is limited until the completion of construction and occupancy. Whilst such piecemeal divestment of authority does not appear to align with the statutory framework itself, accepting SBCA's stance would raise a serious question as to whether anyone is enforcing the fire-safety provisions of the KBTR 2002 who then is responsible regulating structural fire-safety hazards in such commercial buildings</p>	<p>has been observed that the inspection memos purportedly prepared pursuant to the said inspections were neither forwarded to any concerned office nor followed up for compliance or implementation.</p> <p>Upon careful scrutiny of the record, it appears that the inspection memos, as well as the corresponding letters addressed to the management of Gul Plaza, could be construed as an "afterthought" subsequent to the fire incident. This conclusion is supported by multiple factors:</p> <ol style="list-style-type: none"> Firstly, both inspection memos do not bear the signatures of the management. Instead, only the name of Syed Imran Elahi, General Secretary, along with a contact number, has been recorded. Secondly, the identical handwriting, format, and style observed in both memos raise serious concerns regarding their authenticity and contemporaneity. <p>Even if the benefit of doubt is extended to the officers concerned, the manner in which the name of the management representative (though illegal) has been inscribed beneath the signature line indicates that both memos were likely prepared at the same time. This inference is further strengthened by the absence of any independent acknowledgment or receipt from the management.</p> <p>Moreover, almost identical conclusion recorded in both the inspection memos suggest that the officers in question did not invoke sub-rule (3) of Rule 9 of the Civil Defence (Special Powers) Rules, 1951, which empowers the Government to cause the required measures to be undertaken itself and to recover the cost thereof from the</p>
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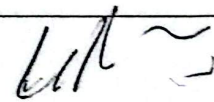
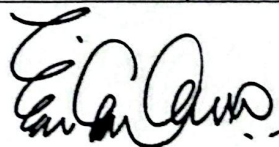
:		<p>owner or occupier. The failure to resort to this statutory mechanism, despite noted deficiencies, further reflects lack of due diligence and raises doubts.</p> <p>Additionally, during the proceedings of the Implementation Committee, Mr. Tanveer Pasta (President of the unregistered/illegal Management Committee) was specifically queried as to whether he or any member of the management had received the said inspection memos. His and said Imran Elahi response was unequivocally in the negative.</p> <p>Further, attention is invited to the statement submitted by the Additional Controller, Civil Defence, before the Inquiry Commission in response to the following query:</p> <p>“Did Civil Defence identify preparedness gaps in Gul Plaza or similar markets?”</p> <p>The response furnished was as follows:</p> <p>“As stated in answer No. 30, the management should improve fire safety and other associated safety measures as compared to other shopping malls adjacent to Gul Plaza, such as M/s Gul Tijarah Mall and City Center Shopping Mall.”</p> <p>It is pertinent to observe that, in the aforementioned inspection memos, the Senior Instructor had recorded fire safety deficiencies in terms indicating mandatory compliance, i.e., “need to improve.” However, in the statement submitted before the Inquiry Commission, the same observations were diluted and recharacterized as merely advisory in nature, i.e., “should improve,” without any cogent justification.</p>
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		<p>This unexplained inconsistency, without any cogent justification, reflects adversely on the conduct and credibility of the officers concerned and raises serious doubts regarding the bona fides of their actions.</p> <p>In view of the foregoing, the Implementation Committee is of the considered opinion that the conduct of the aforesaid officers warrants further inquiry. Accordingly, it is recommended that appropriate disciplinary proceedings may be initiated against them under the Sindh Civil Servants (Efficiency & Discipline) Rules, 1973.</p> <p>Similarly, action is also required against the then Directors, Civil Defence (from 2021 till the incident) under E&D Rules, 1973 for their failure to supervise subordinate offices in order to ensure their government policies and implementation of laws.</p> <p>Deputy Commissioner, South</p> <p>Having regard to the above, the Implementation Committee was also apprised that powers and duties under Rules 7, 8, 9, 12, 13, 15, 16, 18, 19, 20, 21 and 22 of the Civil Defence (Special Powers) Rules, 1951 were delegated to the Deputy Commissioners within their respective jurisdictions vide Notification No. 5(12)/CD Rangers dated 26th September, 1963.</p> <p>In this backdrop, the role of the DC South, within whose territorial jurisdiction the subject Gul Plaza falls, requires examination. While the <i>ibid</i> Rules may indicate a supervisory role in respect of inspections and compliance, it remains to be determined whether, and to what extent, such supervisory responsibility translates</p>
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into accountability in the present circumstances as the DC is the Controller of the Civil Defence.

Particularly, in view of the prima facie concerns regarding the authenticity of the inspection memos and the possibility that inspections may not have been conducted as recorded, it is necessary to ascertain whether any directions were issued or oversight exercised by the DC South.

At the same time, it also requires consideration whether day-to-day operational control of the Civil Defence Department, being vested in the Director, limits or excludes the responsibility of the DC in such matters.

Accordingly, the extent of responsibility, if any, attributable to the DC South is left open for further determination for the reasons inscribed below.

This assessment shall also take into consideration that the High Court of Sindh, in CP No. D-01 of 2017, directed the establishment of a **three-tier Task Force** at the **Divisional, District, and Sub-Divisional** levels. The **Divisional Task Force** is headed by the **Additional Commissioner-I, Karachi Division**; the **District Task Force** by the **Additional Deputy Commissioner-I** of the concerned district; and the **Sub-Divisional Task Force** by the respective Assistant Commissioner.

A common mechanism was envisaged across all three tiers for inspection of **high-rise buildings, factories, and industrial units**. Notably, the **Sub-Divisional Task Force** was specifically mandated to remain vigilant in respect of **fire incidents** and to promptly report the same to the **Fire Brigade Department, KMC** and other concerned authorities for immediate redressal.







		<p>The composition of all three tiers of Task Forces includes representatives from the Sindh Building Control Authority, Civil Defence and the Fire Department, KMC The implications of this framework, particularly in relation to shared responsibility and coordination among departments, may also require consideration including implementation (if any of the said judgment) while determining the extent of accountability in the present matter. However, it is imperative to mention that Inquiry Commission noted the following:</p> <p><i>“no such audit of Gul Plaza has been undertaken [by the above-mentioned task force] as per the record available.”</i></p> <p>The DC South appeared before the Implementation Committee and was questioned regarding whether any fire safety audit of Gul Plaza had ever been conducted. From the response furnished by the DC South, it appears that multiple meetings were convened by the office of the DC South from the year 2021 through 2025, wherein matters relating to the implementation of fire safety measures and audits of high-rise buildings and commercial plazas were regularly discussed.</p> <p>One of the findings contained in the report dated 22 December 2023 recorded the following observations:</p> <p><i>“Gul Plaza, Ghaziani Mall, Jama Mall, Maryam Market, and Iqbal Centre were inspected and found not to be properly equipped with fire safety measures. Godowns and parking areas had been converted into shops, while emergency exits were found blocked by shopkeepers.”</i></p>
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The material placed on record by the DC South suggests that there existed a mechanism of continuous monitoring, review meetings, and inter-agency coordination involving representatives of Civil Defence, SBCA, KMC, the Fire Department, the Electrical Inspector from the Energy Department, and K-Electric. However, it remains unclear why such audits and continuous monitoring were not adequately reflected before the Commission of Inquiry, particularly when the record furnished by the DC South appears to rebut the Commission's stance that no audit of Gul Plaza had been conducted by the Task Force constituted pursuant to the order of the High Court of Sindh.

Another matter of concern is that the violations identified in successive audits of Gul Plaza appear to have remained substantially unchanged. This raises a serious question regarding the effectiveness of implementation measures. Despite the DC South chairing meetings concerning compliance and enforcement, the recurring nature of the same deficiencies indicates that implementation of the audit findings remained unsatisfactory and ineffective, when the available statutory mechanism under rule (3) of Rule 9 of the Civil Defence (Special Powers) Rules, 1951, were not exhausted, which empowers the Government to take the required measures itself and to recover the cost thereof from the owner/or occupier.

The most alarming aspect of the statement submitted by the DC South pertains to the Civil Defence audit reports for the years 2024 and 2025, which had been relied upon and referred to by the Inquiry Commission in arriving at its findings. The DC South has expressly disputed the authenticity of both inspection memos, stating that he personally visited the Civil Defence Office and examined the outward register, wherein no corresponding entries



	<p>regarding the issuance of the purported notices or schedules for the years 2024 and 2025 were found. According to the statement of the DC South:</p> <p><i>“The absence of such entries prima facie indicates that the aforesaid documents/reports were managed or prepared subsequently after the Gul Plaza incident and were not part of the officially maintained record at the relevant time.”</i></p> <p>This issue remains open for further inquiry and fixation of responsibility. The observations of the DC South appear to substantially align with the conclusion reached by the Implementation Committee, leaving little room for doubt that the Director, Additional Controller (South) and Senior Instructor of Civil Defence may be proceeded against under the Sindh Civil Servants (Efficiency & Discipline) Rules, 1973.</p> <p>Fire Department, KMC</p> <p>Mr. Humayun Khan, Chief Fire Officer, KMC appeared before the Implementation Committee and was queried regarding the certificate dated 20th March, 2024 issued by the Fire Department, KMC in respect of “M/s Gul Plaza Basement Shopping Mall.”</p> <p>The said certificate certified that the fire-fighting equipment installed within the premises was found to be in working and serviceable condition, as inspected by the concerned Station Officer, Fire Brigade Department, KMC. The certificate was signed by the Station Officer, Central Fire Station.</p> <p>The Chief Fire Officer KMC, informed the Committee that the said certificate had been issued by Mr. Zaheer</p>
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Siddiqui, who was then posted as **Station Officer, Central Fire Station**, and is presently posted at Orangi Fire Station. It was further stated that an explanation had been sought from Mr. Siddiqui, to which he responded that the certificate dated 20th March, 2024 pertained only to the fire safety equipment installed within the **basement area of "M/s Gul Plaza Basement Shopping Mall"**. According to him, the certificate was limited in scope and confined to the equipment available at the time within the basement premises, and did not extend to the entire building or purport to reflect the condition or adequacy of fire safety arrangements beyond the specified area.

Upon being asked under what law, rules, or regulations the Fire Department KMC conducts inspections or fire risk assessments, the Chief Fire Officer, KMC stated that such assessments are carried out strictly upon **formal request** of the owner or occupier, in accordance with prescribed procedures. However, he candidly acknowledged that the certificate in question had been issued **without authorization**, and **without the approval** or endorsement of the Chief Fire Officer, KMC thereby rendering it devoid of legal validity.

The Chief Fire Officer, KMC further recommended that the matter may be referred to the Human Resources Department, KMC for appropriate disciplinary action against the said officer.

The Implementation Committee, however, is of the considered view that the certificate issued by **Mr. Zaheer Siddiqui** in favour of the management of Gul Plaza cannot be construed as being limited in scope to the basement area alone. This conclusion is drawn from the fact that the certificate was issued in the name of **"M/s Gul Plaza Basement Shopping Mall"** without any



		<p>explicit limitation restricting its applicability solely to the basement premises or specific equipment therein. Nevertheless, the assertion by Mr. Siddiqui that the certificate was valid for a period of one year appears to be consistent with the contents of the certificate itself.</p> <p>Further, the position taken by the Chief Fire Officer, KMC that fire risk assessments are conducted only upon request, without reference to any clearly articulated statutory framework before the Committee, raises an additional matter of concern.</p> <p>This concern is reinforced when viewed in light of the findings of the Commission of Inquiry, which observed that civil defence responsibilities, including firefighting and rescue operations, are not confined solely to the Civil Defence Department. Rather, such functions are concurrently vested in the KMC under entries 45 and 46 to Schedule II of Section 72 of the Sindh Local Government Act, 2013.</p> <p>Similarly, the Commission of Inquiry opined that the stance advanced by KMC that firefighting and rescue obligations have been transferred to Rescue 1122 under Section 4(3) of the Sindh Rescue Services Act, 2023 does not appear to be in conformity with the judgment of the Supreme Court of Pakistan in CP No. 9 of 2010 (orders dated 5th February 2020 and 7th February 2020). In the said judgment, section 74 of the Sindh Local Government Act, 2013 which empowered the Provincial Government to assume or transfer municipal functions to other authorities was struck down.</p> <p>In view thereof, any assertion that firefighting and rescue functions stand exclusively transferred to another entity, to the exclusion of KMC or other statutory bodies,</p>
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		<p>appears legally untenable. The Commission of Inquiry, in this context, noted the following:</p> <p><i>"The Hon'ble Court held that such transfer of functions could not operate to divest or dilute the statutory responsibilities of local government, particularly the KMC, and that the existence of parallel or overlapping authorities does not absolve municipal bodies of their obligation."</i></p> <p>Similarly, the explanation furnished by the then Station Officer appears to be an "afterthought" post the findings of the Inquiry Commission exposing the unauthorized letter, and warrants consideration for appropriate action including by the KMC under the applicable service rules. This conclusion may be read in conjunction with the way forward as suggested under ToR C, which also makes reference to the Fire Audit conducted by the Fire Department, KMC in 2021, and the violations identified therein, which were subsequently reiterated in the preliminary Fire Incident Report dated 2nd February, 2026 but remained unrectified. Further, the Implementation Committee observed that there are 454 vacant positions in Fire Dept., including 207 posts of Fireman and 163 posts of Driver, among others, which require immediate initiation of the requirement process. This includes making the New Truck Stand Fire Station located at Maripur functional, which has remained non-functional due to shortage of staff and fire driver.</p> <p>SBCA</p> <p>The DG, SBCA, was questioned regarding the observations of the Inquiry Commission concerning the SBCA's inspection role in respect of large-scale buildings. In response, the DG, SBCA clarified that,</p>
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		<p>under the prevailing legal framework, SBCA's role post-completion is limited to acting upon complaints or credible information, as mandated by law.</p> <p>He further referred to Section 7-B of the, SBCO, 1979 in the context of the Inquiry Commission's observations on SBCA's continuing obligations relating to fire safety and compliance in large-scale commercial structures such as Gul Plaza. He explained that the said provision specifically pertains to "dangerous buildings," defined as structures that are in a ruinous condition, likely to collapse, or otherwise pose a threat to occupants, adjoining properties, or the general public.</p> <p>The DG, SBCA emphasized that Section 7-B must be read in conjunction with Section 14 of the SBCO, 1979 which establishes a mechanism that is clearly complaint-driven or triggered by receipt of credible information.</p> <p>Having said that, and in line with the previously stated observations under ToR-B, and in view of the apparent absence of an effective post-construction monitoring regime within SBCA, it is recommended that appropriate amendments may be introduced in the SBCO, 1979 to expressly empower field officers to undertake routine inspections of buildings after completion of construction on per annum basis.</p> <p>Collective Responsibility</p> <p>Further, in addition to the above task forces and the delegation of powers to the DCs under the Civil Defence (Special Powers) Rules, 1951, a "District South Technical Committee for Fire Safety Audit" was notified by South dated 20th November, 2023 for commercial and other buildings within District South. Its</p>
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composition again brought the District Administration together as **DC South** being its Convenor, and reps from **SBCA, KMC Fire Brigade, Civil Defence, Rescue 1122 and other relevant agencies**. Its ToRs required safety audit of shopping malls, **shopping centers and plazas** with particular reference to **automatic fire suppression systems, fire-safety mechanisms, fire extinguishers, emergency exits, electrical wiring and conformity with approved standards, and further required examination of building plans and compliance with building-control laws**.

Surprisingly, the Commission of Inquiry report indicated that no such audit of the Gul Plaza was conducted pursuant thereto, which is contrary to the material submitted by the DC South that multiple audits were carried out. However, the implementation/ rectification of the violation remained an issue.

Moreover, even if the interpretation advanced by the DG, SBCA were to be accepted regarding complaint driven or credible information under the *ibid* sections, the Implementation Committee is of the considered view that the Committee constituted by the DC South, vide notification dated 29th November 2023, had a clear and adequate opportunity to undertake a **fire safety audit of Gul Plaza**. The ToR of the said Committee, *inter alia*, required examination of approved building plans and compliance with applicable building control laws, matters which squarely fall within the ambit of **sections 7 and 14 of the SBCO, 1979**.

Such an exercise was conducted on 7th December 2023, based on the record submitted by the DC South under the supervision of the Assistant Commissioner, Garden, with participation from representatives of the KMC, Fire

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		<p>Department (KMC), Civil Defence, SBCA, and other relevant authorities. As per the audit report on Gul Plaza, the emergency exits, exit corridors, and stairways were not readily accessible and were obstructed or impeded.</p> <p>In the follow-up meeting held on 26th September 2024, it was, <i>inter alia</i>, decided that SBCA would conduct a survey to identify buildings lacking essential safety measures, including emergency fire exits and firefighting equipment, and issue notices to the respective owners. A similar decision was reiterated in the follow-up meeting held on 3rd October 2025. This sequence of events creates the clear impression that no meaningful rectification of the violations had taken place, despite the fact that SBCA officials themselves were members of the audit team that inspected Gul Plaza in 2023.</p> <p>The inspection, in essence, gave rise to credible information, particularly because representatives of SBCA had directly observed the encroachments, which were later also identified in the Forensic Report.</p> <p>Thus failure to rectify these violations therefore amounts to a continuing omission attributable to the members of the aforesaid Committees.</p> <p>Therefore;</p> <ol style="list-style-type: none"> In view of the two task forces/committees, SBCA responsibilities do not come to an end post completion, as under these committees they had the obligation for post completion inspection and implementation on any violations. Therefore, the nominated SBCA member(s) of the aforesaid committees since 2020 till the incident to be proceeded under the relevant law.
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		<ul style="list-style-type: none"> ii. In addition to the statutory obligation of the KMC under the Local Govt. Act, 2013, the nominated Fire Department, KMC member(s) of the aforesaid committees since 2020 till the incident to be proceeded under the relevant law. iii. In addition to the statutory obligation of the Civil Defence Officers under the Civil Defence (Special Powers) Rules, 1951 and Civil Defence Act, 1952, the nominated Civil Defense member(s) of the aforesaid committees since 2020 till the incident to be proceeded under the relevant law. iv. DC as Controller of the Civil Defence. so also, the convener of the District South Technical Committee for Fire Safety Audit, for his laxity in supervision under the Civil Defence Rules, 1951 and other applicable government policies/laws. v. ADC and AC as head of the respective aforesaid Task Forces/ Committees for not being able to review the status of implementation, monitoring, and follow up of Task Force functions related to fire safety inspections and audits.
<p>E. To ascertain the causes and circumstances leading to the fire incident at Gul Plaza Shopping Center, Karachi;</p>	<p>The Commission has not been assisted with a forensic report, hence, is unable to verify the causation suggested in or around Shop No. 193. The Commission further finds that the nature and extent of fire was materially shaped by the surrounding circumstances in which that ignition occurred, namely a building already operating</p>	<p>As per the evidences submitted before the Commission of the Inquiry and the Forensic Report almost reach the same conclusion that the incident happened because of the localized fire flame trigger, pre hazardous environment, that allowed that allowed the fire to spread with exceptional speed and intensity.</p>

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<p>F. To examine and evaluate rescue operations for adequacy and swiftness;</p>	<p>with serious fire-safety deficiencies and containing a dense mixed commercial fire load of highly combustible material. In these circumstances, the outbreak appears to have escalated rapidly from a localized flame into a large-scale and uncontrollable fire.</p> <p>Therefore, irrespective of the initial trigger of the fire, it was the interaction of that ignition with a pre-existing hazardous environment that allowed the fire to spread with exceptional speed and intensity.</p> <p>There was a delay in notifying the Fire Department by the management and proprietors of Gul Plaza. The premature disconnection of electricity further impaired visibility thereby diminishing the prospects of effective rescue and evacuation.</p> <p>The fire began at about 10:00 to 10:05 p.m. The first call for fire brigade was made at about 10:26p.m. The first fire tender reached at about 10:40 p.m., with the second at approximately 10:49 p.m. Measured against the Fire Department's own stated response benchmark of 6 to 7 minutes, the response appears delayed.</p> <p>There was a discontinuity in water supply, with shortage or exhaustion of water in the initial phase. Despite the presence of combustible and mixed commercial fire load, more appropriate fire suppression tools such as foam were not deployed. The Civil Defence report absence or insufficiency of gas masks, breathing apparatus,</p>	<p>Whereas, this matter can be conclusively decided by the trial court after examining the evidence in detail.</p> <p>1. Delay on the Part of Fire Tenders, KMC, and Rescue 1122</p> <p>There appears to have been a delay on the part of the Fire Dept., KMC, and Rescue 1122 in responding to the incident. The emergency response agencies ought to have arrived at the scene at an earlier stage to effectively contain the fire and minimize loss.</p> <p>The incapacity of Rescue 1122 due to an alleged shortage of fire stations, vehicles, or fire tenders cannot absolve or diminish its statutory responsibility, particularly in light of the obligations imposed upon it under the Sindh Emergency Rescue Service Act, 2023. The statutory mandate bestowed upon Rescue 1122 under the above special law obligates it to maintain operational preparedness and respond effectively to emergencies of such nature.</p> <p>2. Water Shortage and Firefighting Infrastructure Deficiencies</p>
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	<p>SCBA/SCBA gear, cutters, crowbars, smoke ejectors, foam, proper protective clothing and other specialized rescue equipment limited the ability of responders to undertake effective rescue. The deployment of specialised equipment, particularly the snorkel, does not appear to have been timely or fully employed during the critical rescue window.</p> <p>Absence of internal hydrant systems, lack of emergency lighting, grilled or obstructed openings, and ineffective management of exits, significantly constrained the ability of responding agencies to operate effectively and forced reliance upon external firefighting.</p> <p>Access constraints outside the building, blocked exits and windows, including narrowed carriageway, congestion, crowd pressure, and the prevailing Green Line / BRT works affected the speed and positioning of emergency vehicles and supporting water supply.</p> <p>Administrative and emergency-response setup did not appear to be adequately trained or equipped to deal with an incident of this magnitude.</p> <p>On the present record, these factors indicate but a broader institutional shortcoming in preparedness for a large-scale urban commercial fire involving smoke entrapment, upper-floor rescue, constrained access and sustained suppression requirements.</p>	<p>The Commission's report highlighted discontinuity in water supply and shortage of water during the initial rescue operation. Further, the report raised concerns regarding the existence and functionality of the internal hydrant system.</p> <p>Upon examination of the revised building construction plans, a discrepancy emerged. In one of the sanctioned drawings, an underground water tank was shown; however, in another plan, the same space depicted two toilets marked as male and female facilities. This dichotomy concerning the existence of the underground water tank prompted a query to the Chief Fire Officer, KMC who informed that no dedicated firefighting water storage tank existed at the premises, despite such facilities ordinarily being available in buildings to combat fire incidents.</p> <p>However, the Civil Defence report records the existence of a 2,400-gallon underground water tank, thereby raising serious concerns regarding the credibility of inspection memos.</p> <p>3. Inadequate Firefighting Equipment and Emergency Response</p> <p>The Commission's report further observed the absence or inadequate employment of firefighting equipment and apparatus during the rescue operation. In response, DG Rescue 1122 maintained that requisite equipment was available; however, due to the intensity of the fire and extreme temperatures allegedly reaching approximately 600°C, its personnel were unable to enter the premises. According to DG Rescue 1122, the equipment could only be deployed to prevent further spread of the fire to the adjacent building at the initial stage.</p>
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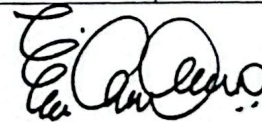
This stance regarding extreme temperatures finds corroboration in the forensic report, wherein the minimum recorded temperature was approximately 400°C and the maximum reached 1200°C.

Nevertheless, keeping in view its role as the lead rescue agency, it appears that Rescue 1122 lacked adequate preparedness, training, or operational capability to effectively respond to an incident of such magnitude. Further, in addition to the statutory obligation of the Rescue Services Officers under the Sindh Rescue Services Act, 2023 the nominated Rescue Services member(s) of the aforesaid committee since 2023 till the incident to be proceeded under the relevant law.

4. Comparative Responsibility of KMC Fire Brigade

Notwithstanding the above, major responsibility in terms of firefighting functions appears to rest upon the KMC Fire Brigade under entries 45 and 46 to Schedule II of Section 72 of the Sindh Local Government Act, 2013, as also supported by the SC judgment in CP No. 9 of 2010 wherein the SC stated that the local government is a third tier of government provided by the Constitution at the grassroots level having direct impact on the life of the citizens and one of the primary duties is **keep the citizens safe from fire.**

Attention is also drawn to Section 34 of the Sindh Emergency Rescue Service Act, 2023 which stated the following:



		<p><i>"This Act is not in derogation of any other law applicable in the Province and does not absolve any other person from his responsibility"</i></p> <p>A plain reading of the aforesaid provision suggests that the impression that emergency rescue services stand exclusively transferred under the <i>ibid</i> Act may not constitute the correct legal interpretation. Rather, the responsibilities of Rescue 1122, the Fire Dept., KMC appear to be in concurrent in nature.</p> <p>A plain read of the <i>ibid</i> section, the impression that the emergency rescue services stand transferred under the <i>ibid</i> Act may not be the correct interpretation, as the responsibilities of Rescue 1122 and the KMC (Fire Dept.) and other emergency agencies are 'concurrent' in nature.</p> <p>Therefore, the existence of Rescue 1122 does not extinguish, supersede, or dilute the responsibility of the Fire Department, KMC particularly in light of operational realities. operational realities. The Fire Dept, KMC possesses substantial firefighting capacity, including 26 functional fire stations, as compared to only 4 stations available with Rescue 1122. In the instant case, the fire tender dispatched by Rescue 1122 reportedly originated from DHA Phase II, being the nearest available station. However, owing to Fire Department's 'Central Fire Station' closer proximity to Gul Plaza, as well as comparatively superior institutional resources, operational experience, and manpower, the KMC Fire Dept. ought to have responded more promptly and undertaken a more robust firefighting operation.</p> <p>5. Responsibility of Management Committee</p>
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<p>G. To fix responsibility for any acts of commission or omission committed prior to and subsequent to the incident;</p>	<p>Responsibility lies with:</p> <ol style="list-style-type: none"> Those who controlled, operated, and commercially benefitted from Gul Plaza. KMC, through its Fire Department, for deficiencies in operational preparedness, resource deployment, and execution of firefighting and rescue functions. The statutory scheme under the Sindh Local Government Act, 2013 and the judgment of the Hon'ble Supreme Court in Const. Petition No. 9 of 2010, make it clear that 	<p>Internal deficiencies such as lack of water availability, absence or inadequacy of firefighting apparatus, blocked exits, or encroachments obstructing passageways—as identified in the forensic reports, the responsibility of such falls on the Management Committee and its President.</p> <p>6. Ban on Electric Inspections</p> <p>The notification issued by Irrigation & Power Dept. banning electrical inspections of buildings and other premises by the Electrical Inspectorate, which has remained in force since 2003, needs to be recalled by the Energy Department. If, for any reason, the Electrical Inspectorate was previously prevented from carrying out inspections, the necessary strengthening and restructuring measures should have been completed by now. Conducting periodic inspections is a statutory obligation under the Electricity Act, 1910 and the applicable law/rules. Such inspections are essential to prevent future electricity-related mishaps, including short circuits and fire incidents.</p> <p>Agreed with i. to viii.</p> <p>The Implementation Committee in discharge of its mandate has addressed each responsible agency, department and Management Committee in relations to the findings of the Commission of Inquiry, particularly concerning the deficiencies, omissions, and failures attributable to the respective entities.</p> <p>Commission of Inquiry has pointed out the mechanism and framework existed in the law but it was not</p>
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	<p>the existence of parallel or overlapping authorities do not dilute municipal responsibility.</p> <p>iii. Civil Defence for identifying serious fire-safety deficiencies but failing to secure compliance through effective enforcement.</p> <p>iv. The district Administration because the office of DC stands at the center of more than one legal and administrative framework relevant to the fire.</p> <p>v. Sindh Building Control Authority for failing to effectively act under Section 7-F of the Sindh Building Control Ordinance, 1979, where any building is deemed by the Authority to be in a condition dangerous to its occupants or to the public, the Authority is empowered and obligated to require remedial action by notice.</p> <p>vi. Rescue 1122 for failing to discharge its concurrent rescue-support and coordination mandate with the degree of urgency and effectiveness.</p> <p>vii. Police and traffic police could not fully maintain order, secure the site, control the traffic, and secure the access corridors due to constraints like BRT works, narrow carriageway, crowd pressure, and vehicle obstruction.</p> <p>viii. Government of Sindh's ban on electric inspections vide a notification dated 13 August 2003.</p>	<p>effectively implemented. Concerned officers/officials were well aware of the deficiencies but did not act upon.</p> <p>A human tragedy occurred and dozens of lives were lost and thousands of people lost livelihoods. In order to bring justice to them and to ensure that such incidents do not occur again, a coordinated and effective action is required from all relevant authorities, including the KMC, Civil Defence, SBCA and Rescue 1122, among others, to ensure compliance with safety regulations, accountability of past omissions and implementation of safeguards to prevent recurrence of such incidents.</p>
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ACT: REPORT ON GUL PLAZA FIRE INCIDENT

In the aftermath of the Gul Plaza fire incident, the Provincial Cabinet constituted a Commission of Inquiry headed by Justice Agha Saeed of the Sindh High Court at Karachi. Subsequent to the submission of the report by the Inquiry Commission, the Provincial Cabinet constituted an Implementation Committee. The Implementation Committee had its multiple meetings wherein each ToR / and its conclusion of findings given by the Commission of Inquiry was considered at length and the relevant departments/ officers and including private persons were called upon and afforded opportunity of giving their point of view.

In this context, a detailed Report is placed at **Annexure-A**. Summary of the Way Forward with respect to omissions or commissions as per the mandate of the Implementation Committee is given below.

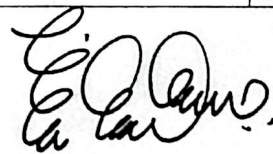
For the ease of reference, the aforesaid ToRs of the Commission of Inquiry are reproduced herein below:

- a) To examine if the building approvals and lease extensions by Sindh Building Control Authority, its predecessor organizations and KMC were in accordance with applicable laws, rules and regulations;
- b) To assess if the construction of Gul Plaza was in violation of the approved building plan leading to difficulty in evacuation of people;
- c) To assess arrangements in place at Gul Plaza building for fire prevention, detection and fire-fighting by building management as required under applicable laws and safety regulations;
- d) To assess if the building management or any government department/agency had carried out fire safety audits and whether the recommendations were implemented by the building management;
- e) To ascertain the causes and circumstances leading to the fire incident at Gul Plaza Shopping Center, Karachi;
- f) To examine and evaluate rescue operations for adequacy and swiftness; and
- g) To fix responsibility for any acts of commission or omission committed prior to and subsequent to the incident



AGENCY	WAY FORWARD	FIXATION OF RESPONSIBILITY
<p data-bbox="353 156 443 188">SBCA</p>	<p data-bbox="577 124 1310 288">There is an absence of a post-construction monitoring mechanism. Therefore, suitable amendments be introduced in the Sindh-Building Control Ord (SBCO), 1979 to expressly empower SBCA officers to carry out inspections of buildings after completion of construction.</p> <p data-bbox="577 325 1310 523">A periodic inspection regime may be established, mandating SBCA, Rescue 1122, KMC and Cantonment Boards etc. to conduct inspections of all buildings particularly high rise, commercial structures, to ensure continued compliance with approved plans, fire safety standards and other applicable regulations.</p> <p data-bbox="577 560 1171 592">Implementation of the Condominium Act, 2014.</p>	<p data-bbox="1375 124 2024 424">1. Orders/directions passed by the SHC in CP No. 1 of 2017, three-tier Task Forces at the Divisional, District, and Sub-Divisional levels were established. The Divisional Task Force is headed by the Additional Commissioner-I, Karachi Division; the District Task Force by the Additional Deputy Commissioner-I of the concerned district; and the Sub-Divisional Task Force by the respective Assistant Commissioner.</p> <p data-bbox="1413 461 2024 719">A common mechanism was envisaged across all three tiers for inspection of high-rise buildings, factories, and industrial units. Notably, the Sub-Divisional Task Force was specifically mandated to remain vigilant in respect of fire incidents and to promptly report the same to the Fire Brigade Department, KMC and other concerned authorities for immediate redressal:</p> <p data-bbox="1413 756 2024 887">The composition of all three tiers of Task Forces includes representatives from the Sindh Building Control Authority, Civil Defence and the Fire Department, KMC.</p> <p data-bbox="1323 924 2024 1248">2. Further, in addition to the above task forces and the delegation of powers to the DCs under the Civil Defence (Special Powers) Rules, 1951, a “District South Technical Committee for Fire Safety Audit” was notified by DC South dated 20th November, 2023 for commercial and other buildings within District South with DC South as its Convenor, and include reps from SBCA, KMC Fire Brigade, Civil Defence, Rescue 1122 and other relevant agencies. Its ToRs required safety audit of shopping malls, shopping centers and plazas with particular reference to</p>





		<p>automatic fire suppression systems, fire-safety mechanisms, fire extinguishers, emergency exits, electrical wiring and conformity with approved standards, and further required examination of building plans and compliance with building-control laws.</p> <p>3. In view of the Two task forces/committees, SBCA responsibilities do not come to an end post completion, as under these committees they had the obligation for post completion inspection and implementation on any violations. Therefore, the nominated SBCA member(s) of the aforesaid committees since 2020 till the incident to be proceeded against under the relevant law.</p> <p>4. <i>The building plan was initially submitted in 1979, whereas, revised plan was allowed in 1998, changing the dynamics of the building and ultimately regularized the building in 2003 under an amnesty scheme Those who approved the revised plan and regularized the plan be proceeded against.</i></p>
KMC	<p>Implementation of the Local Government Act, 2013 (in particular functions under section 72)</p> <p>Training of Fire Department.</p> <p>Implementation of the Fire Audit reports.</p> <p>To make New Truck Stand Fire Station located at Maripur functional (shortage of staff and fire driver)</p> <p>To initiate the process for filling 454 vacant positions in Fire Department, including 207 posts of Fireman and 163 posts of Driver, among others.</p>	<ol style="list-style-type: none"> 1. Fire Department, KMC, through its Fire Department, for deficiencies in operational preparedness, delay, resource deployment, and execution of firefighting and rescue functions. 2. Nominated Fire Department, member(s) of the aforesaid committees since 2020 till the incident to be proceeded against under the relevant law. 3. Action against Mr. Zaheer Siddiqui, who was then posted as Station Officer, Central Fire Station for issuance of certificate dated 20th March, 2024 that certified that the fire-fighting equipment installed within the premises of the Gul Plaza was found to be in working and serviceable condition. Such certificate was issued without the approval of the Chief Fire Officer, KMC.

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		<ol style="list-style-type: none"> 4. Fire Dept. officials responsible for not ensuring the rectification of the violations as recorded in Fire audit report of the Gul Plaza in 2021. 5. Record reveals that the initial lease period expired in 1983; however, was extended in 1991 with effect from 1983 by the then Mayor, KMC namely Mr. Farooq Sattar on a discounted rate of Rs. 600 per sq. yard as opposed to recommended rate of Rs. 1250 per sq yard. Inquiry be conducted to see whether the Mayor had the power to reduce the rate and condon the period between 1983 and 1991. 6. Having more fire stations, capacity and experience than the Rescue 1122, KMC could have effectively dealt with rescue operations in saving precious lives.
Civil Defence	To transfer peace time functions to Rescue 1122 as already proposed by the Cabinet Sub-Committee	<ol style="list-style-type: none"> 1. Action under the relevant law against Ms. Fatima Memon, Additional Controller (South) and Mirza Mursaleen Baig (Senior Instructor) for dubious/managed inspection memos for the years 2024 and 2025. 2. Director, Civil Defence for his failure to supervise subordinate offices in order to ensure their government policies and implementation of laws. 3. In addition to the statutory obligation of the Civil Defence Officers under the Civil Defence (Special Powers) Rules, 1951 and Civil Defence Act, 1952, the nominated Civil Defense member(s) of the aforesaid committees since 2020 till the incident to be proceeded under the relevant law.

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Deputy Commissioners, South Additional Deputy Commissioners and Assistant Commissioners	-	<ol style="list-style-type: none"> 1. DC, in his capacity as Controller of Civil Defence and Convener of the District South Technical Committee for Fire Safety Audit, for laxity in supervision under the Civil Defence Rules, 1951 and other applicable laws and policies concerning fire safety audits. 2. ADCs and ACs in their capacity as heads of the respective Task Forces, to review the status of implementation, monitoring, and follow-up of Task Force functions relating to fire safety inspections and audits.
RESCUE 1122	To further strengthen under the Sindh Rescue Services Act, 2023, as already proposed by the Cabinet-Sub Committee	<ol style="list-style-type: none"> i. Rescue 1122 for failing to discharge its concurrent rescue-support and coordination mandate with the degree of urgency and effectiveness. ii. In addition to the statutory obligation of the Rescue Services Officers under the Sindh Rescue Services Act, 2023 the nominated Rescue Services member(s) of the aforesaid committee since 2023 till the incident to be proceeded against under the relevant law.
Management Committee, Gul Plaza	To be registered under the Sindh Condominium Act, 2014 and perform their functions in accordance with the said law. To ensure implementation on the fire safety measures, and maintain the building as prescribed under the said statute.	<p>Mr. Tanveer Pasta, President of the unregistered Management Committee including owners and other members of the Committee are responsible for criminal liability because of:</p> <ol style="list-style-type: none"> 1. Internal deficiencies such as lack of water availability, absence or inadequacy of firefighting equipment, blocked exits, or encroachments (excess shops) obstructing passageways (as identified in the forensic report). 2. Dubious/ apparently managed certificate dated 20th March, 2024 that certified the fire-fighting equipment installed within the premises of the Gul Plaza was found to be in working and serviceable condition.





Electric Inspectors

Ban on the Electric inspection of buildings/ establishments etc. by the then Irrigation and Power Dept. in 2003 to be restored. Required action to be taken by the Energy Dept.

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